



Comments of the Port of Seattle Pursuant to WT Docket No. 02-55

In the Matter of Improving Public Safety Communications in the 800 MHz Band and Consolidating the 900 MHz Industrial/Land Transportation and Business Pool Channels

The Port of Seattle is a public safety licensee and our Radio System operates in the 806-809/851-854 MHz band. This is a 4-site (SeaTac, Cambridge, Columbia Tower and Fort Lawton) simulcast trunked system with 10 channels, 1300+ subscriber units (70% portable & 30% Mobiles) and 57 talk groups. The main users are Airport Police, Airport Fire department and Maintenance department.

The proposed consensus plan ("*First, any public safety licensee currently operating in the 806-809/851-854 MHz block or the 814-816/859-861 MHz guard band will swap on a one-for-one basis with a Nextel channel in the 809-814/854-859 MHz block.*" Page 12, second paragraph) suggests moving our 806-809/851-854 MHz band to 809-814/854-859 MHz. The following are some of the issues we need to address before more specific comments can be made:

1. Mitigate the use of frequencies within the region
2. Prepare and implement a smooth cut over plan
3. Change/acquire necessary hardware of all base stations and reprogram them
4. Reprogram all radios to accept the new frequency
5. Optimize the radio system for the new frequency

The disruptions and the logistics of this move are substantial. Additionally, our close proximity to Canada and having no change proposed for a spectrum re-alignment in the border region can cause interference.

Thus the proposed consensus plan will cause disruption of critical services and tremendous financial burden to the Port. Without more specific details and further study, costs cannot be quantified at this time. Certainly, the Port's expectation would be that all costs will be fully funded and the Port would be made whole. This plan cannot be endorsed by the Port at this time without this additional information.

Thank you for giving us the opportunity to comment on the consensus plan and if you have any questions, please contact me at 206.431.4491.

Sincerely,

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